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13 CHURCH OF SCIENTOLOGY INTERNATIONAL

14 UNITED STATES BANKRUPTCY COURT
15
16 NORTHERN DISTRICT OF CALIFORNIA

17 In re)	CASE NO. 95-10911 aj
)	
18 GERALD ARMSTRONG,)	Chapter 7
)	
19 Debtor)	Adv. No. 95-1164
)	
20 CHURCH OF SCIENTOLOGY)	CREDITOR CHURCH OF
21 INTERNATIONAL, a California non-)	SCIENTOLOGY INTERNATIONAL'S
22 profit religious corporation,)	RESPONSE TO DEBTOR GERALD
)	ARMSTRONG'S FIRST
23 Creditor,)	INSPECTION DEMAND TO
)	PLAINTIFF
24 v.)	
)	
25 GERALD ARMSTRONG,)	
)	
26 Debtor.)	
)	

1 For itself, and itself only, Creditor Church of Scientology
2 International ("CSI") responds to the Debtor Gerald Armstrong's
3 First Inspection Demand as follows:

4 **OBJECTIONS AND RESPONSES:**

5 **OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS:**

6 1. CSI objects to the proposed time, date and place of
7 instruction, which have passed. CSI agrees to produce responsive,
8 non-privileged documents for inspection and copying at a date,
9 time, and place to which the parties mutually agree.

10 2. CSI objects to Instruction Number 2. This instruction
11 violates the provisions of Federal Rules of Civil Procedure, Rule
12 34(b), which specifies the permissible methods of document
13 production.

14 3. CSI objects to Instruction Number 5. By defining "you"
15 to include not merely the Creditor, but at least 16 other named
16 entities, including other churches and religious corporations,
17 divisions of corporations, unincorporated associations, and
18 numerous unnamed and unspecified groups, Armstrong is attempting to
19 use this discovery request to compel discovery from non-parties.
20 The only party is CSI, and CSI can and will respond to this
21 inspection demand only for itself.

22 **OBJECTIONS AND RESPONSES TO REQUESTS:**

23 **REQUEST NO. 1:**

24 All documents which in any way discuss, mention, concern, or
25 relate to Gerald Armstrong, or Gerry Armstrong, or any code name or
26 designation identifying Gerald Armstrong used by you.

27 **RESPONSE TO REQUEST NO. 1:**

28 Objection. The request is compound, vague, ambiguous and

1 unintelligible as phrased. Further, the request is overbroad,
2 burdensome and oppressive, in that it is unlimited as to time or
3 subject, and because Armstrong already has possession of the
4 documents he is requesting. Moreover, the requested documents
5 exceed the scope of permissible discovery because they are not
6 relevant to any issue in this case, and because their production
7 will not lead to the discovery of admissible evidence. Moreover,
8 the request violates the work-product privilege and the attorney-
9 client privilege. Further, this request violates the constitutional
10 associational and privacy rights of CSI and others pursuant to the
11 California and United States constitutions. Further, the request
12 seeks to obtain the records of a case which has been ordered sealed
13 by the court having jurisdiction over the underlying action, and
14 seeks to make public record in this action documents which
15 Armstrong agreed, in the settlement agreement which formed the
16 basis for the debt Armstrong now owes to CSI, to return to CSI, and
17 not discuss, disseminate or transfer to anyone. This document
18 request seeks directly to force CSI to relinquish this term of the
19 settlement agreement. Moreover, these parties have been in
20 litigation since 1982. Because of that, Armstrong already has
21 possession, custody or control of the documents which CSI
22 possesses, which are non-privileged, and which are responsive to
23 this request.

24 **REQUEST NO. 2:**

25 The articles of incorporation, and all amendments thereto, of
26 your corporate entities listed in definitions no. 5, above.

27 **RESPONSE TO REQUEST NO. 2:**

28 Objection. The requested documents exceed the scope of

1 permissible discovery because they are not relevant to any issue in
2 this case, and because their production will not lead to the
3 discovery of admissible evidence. Moreover, by defining "you" to
4 include not merely CSI, but at least 16 other named entities,
5 including other churches and religious corporations, divisions of
6 corporations, unincorporated associations, and numerous unnamed and
7 unspecified groups, Armstrong is attempting to use this discovery
8 request to compel irrelevant and unnecessary discovery from non-
9 parties. The only party is CSI, and CSI can and will respond to
10 this inspection demand only for itself. Further, the request is
11 not interposed for any legitimate purpose, but solely to harass
12 CSI. CSI already produced all documents responsive to this request
13 to Armstrong in the case of Church of Scientology International v.
14 Gerald Armstrong, et al., Marin County Superior Court, Case No.
15 157680 ("the State Action").

16 **REQUEST NO. 3:**

17 The By-Laws, and all amendments thereto, of your corporate
18 entities listed in definitions no. 5, above.

19 **RESPONSE TO REQUEST NO. 3:**

20 See response to Request Number 2.

21 **REQUEST NO. 4:**

22 All minutes of all meetings of the Board of Directors of you
23 corporate entities, including but not limited to those entities
24 listed in definitions no. 5, above, which mention, concern or
25 relate in any way to Gerald Armstrong, or Gerry Armstrong, or any
26 code name or designation identifying Gerald Armstrong used by you.

27 **RESPONSE TO REQUEST NO. 4:**

28 See Response to Request Number 2.

1 **REQUEST NO. 5:**

2 All minutes of all meetings of the Board of Directors of
3 corporate entities, including but not limited to those entities
4 listed in definitions no. 5, above, which mention, concern or
5 relate in any way to Judge Paul G. Breckenridge, Jr., Michael J.
6 Flynn, Bruce Bunch, Michael Tabb, Julia Dragojevic, Ford Greene,
7 Paul Morantz, John Elstead, Toby Plevin, Joseph A. Yanny, Michael
8 L. Walton and Charles B. O'Reilly.

9 **RESPONSE TO REQUEST NO. 5:**

10 Objection. The requested documents exceed the scope of
11 permissible discovery because they are not relevant to any issue in
12 this case, and because their production will not lead to the
13 discovery of admissible evidence. Further, this request violates
14 the constitutional associational and privacy rights of CSI and
15 others pursuant to the California and United States constitutions.
16 Further, the request is not interposed for any legitimate purpose,
17 but solely to harass CSI. Further, the request is interposed in
18 bad faith. Armstrong propounded this identical request for
19 documents in the State Action and withdrew it on CSI's objection.

20 **REQUEST NO. 6:**

21 All minutes of all meetings of the Board of Directors of
22 corporate entities, including but not limited to those entities
23 listed in definitions no. 5, above, which mention, concern or
24 relate in any way to "enemies," "suppressive persons," ("SP's") or
25 "squirrels," as such terms are commonly understood in your writings
26 and jargon.

27 **RESPONSE TO REQUEST NO. 6:**

28 Objection. The requested documents exceed the scope of

1 permissible discovery because they are not relevant to any issue in
2 this case, and because their production will not lead to the
3 discovery of admissible evidence. Further, the request is not
4 interposed for any legitimate purpose, but solely to harass CSI.

5 Notwithstanding these objections, CSI does not have
6 possession, custody or control of any documents responsive to this
7 request.

8 **REQUEST NO. 7:**

9 All documents of any kind obtained by you from the Los Angeles
10 Superior Court after December 6, 1986 in the case of and as a
11 result of the December, 1986 settlement of, church of Scientology
12 of California v. Gerald Armstrong, No. C 420153 (hereinafter,
13 "Armstrong I.")

14 **RESPONSE TO REQUEST NO. 7:**

15 Objection. The requested documents exceed the scope of
16 permissible discovery because they are not relevant to any issue in
17 this case, and because their production will not lead to the
18 discovery of admissible evidence. Further, the request seeks to
19 obtain the records of a case which has been ordered sealed by the
20 court having jurisdiction over the underlying action, and seeks to
21 make public record in this action documents which Armstrong agreed,
22 in the settlement agreement which formed the basis for the debt
23 Armstrong now owes to CSI, to return to CSI, and not discuss,
24 disseminate or transfer to anyone. This document request seeks
25 directly to force CSI to relinquish this term of the settlement
26 agreement. Thus, the request is not interposed for any legitimate
27 purpose, but solely to harass CSI. Further, the request is
28 interposed in bad faith. Armstrong propounded this identical

1 request for documents in the State Action and withdrew it on CSI's
2 objection. Moreover, this request concerns issues which Armstrong
3 raised in a cross-complaint in the State Action as to which
4 demurrer was sustained, and Armstrong should not be permitted to
5 re-litigate them here.

6 REQUEST NO. 8:

7 All documents of any kind received by you from Gerald
8 Armstrong after December 6, 1986 pursuant to the December, 1986
9 settlement Armstrong I.

10 RESPONSE TO REQUEST NO. 8:

11 See response to Request No. 7.

12 REQUEST NO. 9:

13 All documents of any kind received by you from Gerald
14 Armstrong's attorneys, including but not limited to Michael J.
15 Flynn, Michael Tabb, Julia Dragojevic, Bruce Bunch, after December
16 6, 1986, pursuant to the December, 1986 settlement of Armstrong I.

17 RESPONSE TO REQUEST NO. 9:

18 See response to Request No. 7.

19 REQUEST NO. 10:

20 All settlement agreements or other contracts entered into by
21 you with each of the following attorneys, litigants, claimants or
22 defendants: Michael J. Flynn, Julia Dragojevic, Bruce Bunch,
23 Michael Tabb, Walt Logan, Garry P. McMurry, William Franks, Laurel
24 Sullivan, Howard Schomer, Gabriel Cazares, Nancy McLean, John
25 McLean, Tonja Burden, Margery Wakefield, Edward Walters, Martin
26 Samuels, Nancy Dincalci, Kima Douglas, Michael Douglas, Robert
27 Dardano, Warren Friske, Tonja Burden, Julie Christofferson, Bent
28 Corydon, Toby Plevin, James Bostrom, Enid Vien, Vicki Aznaran,

1 Richard Aznaran, Sarge Gerbode.

2 RESPONSE TO REQUEST NO. 10:

3 Objection. The request is compound, vague, ambiguous and
4 unintelligible as phrased. Moreover, the requested documents exceed
5 the scope of permissible discovery because they are not relevant to
6 any issue in this case, and because their production will not lead
7 to the discovery of admissible evidence. Further, the request seeks
8 to obtain the records of settlements which have been ordered sealed
9 by the courts having jurisdiction over the underlying actions.
10 Further, the request is not interposed for any legitimate purpose,
11 but solely to harass CSI. Further, the request is interposed in
12 bad faith. Armstrong propounded this identical request for
13 documents in the State Action and withdrew it on CSI's objection.
14 Moreover, this request concerns issues which Armstrong raised in a
15 cross-complaint in the State Action as to which demurrer was
16 sustained and Armstrong should not be permitted to re-litigate them
17 here.

18 REQUEST NO. 11:

19 All declarations, affidavits or other documents signed by any
20 or all of the individuals named in the preceding request as a
21 condition or part of, or in connection with, any settlement entered
22 into between said individuals and you.

23 RESPONSE TO REQUEST NO. 11:

24 See Response to Request No. 10.

25 REQUEST NO. 12:

26 All documents of any kind provided at any time by you in any
27 way or manner whatsoever to any member of the media or any media
28 company or organization which mention, concern or relate in any way

1 to Gerald Armstrong.

2 RESPONSE TO REQUEST NO. 12:

3 Objection. The requested documents exceed the scope of
4 permissible discovery because they are not relevant to any issue in
5 this case, and because their production will not lead to the
6 discovery of admissible evidence. Further, the request is
7 duplicative, and interposed in bad faith, solely to harass CSI.
8 CSI has already produced all documents responsive to this request
9 to Armstrong in the State Action. Moreover, this request concerns
10 issues which Armstrong raised in a cross-complaint in the State
11 Action as to which demurrer was sustained and Armstrong should not
12 be permitted to re-litigate them here.

13 REQUEST NO. 13:

14 All documents, reflecting, evidencing or relating to any and
15 all financial expenditures of any kind or nature, including, but
16 not limited to, wages, fees, charges, costs, payments, deposits,
17 advances, transfers or donations, for, or relating in any way to,
18 actions or things of any kind or nature, including, but not limited
19 to work, services, products, operations, communications,
20 evaluations, executions, missions, projects, transportation,
21 publications, writings, transmissions, disseminations, which
22 mention, concern or relate in any way to Gerald Armstrong, made at
23 any time from 1981 through the present to anyone or any entity,
24 including, but not limited to attorneys, law firms, brokers,
25 contractors, developers, private investigators, private
26 investigator firms, agents, agencies, operatives, case officers,
27 cutouts, your employees, your directors, and businesses or other
28 entities including printers, mail services, suppliers,

1 communications companies, and airline companies.

2 RESPONSE TO REQUEST NO. 13:

3 Objection. The request is compound, vague, ambiguous and
4 unintelligible as phrased. Moreover, the requested documents
5 exceed the scope of permissible discovery because they are not
6 relevant to any issue in this case, and because their production
7 will not lead to the discovery of admissible evidence. Further,
8 the request is not interposed for any legitimate purpose, but
9 solely to harass CSI.

10 REQUEST NO. 14:

11 All documents, providing recording, reflecting, evidencing or
12 relating to the name, address and telephone number of each
13 individual member of the media or any media company, organization
14 or entity to whom you at any time provided any and all documents of
15 any kind which mention, concern or relate in any way to Gerald
16 Armstrong.

17 RESPONSE TO REQUEST NO. 14:

18 See response to Request No. 12.

19 REQUEST NO. 15:

20 All documents, providing recording, reflecting, evidencing or
21 relating to the time, place, identity of your agent provider or
22 transmitter, and means of transmission or provision by you to any
23 member of the media or any media company or organization or entity
24 of each and every documents of any kind which mentions, concerns or
25 relates in any way to Gerald Armstrong.

26 RESPONSE TO REQUEST NO. 15:

27 See response to Request No. 12.

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1 **REQUEST NO. 16:**

2 All documents of any kind provided by you at any time in any
3 way or manner whatsoever to any member of the media or to any media
4 company or organization which mention, concern or relate in any way
5 to Michael J. Flynn.

6 **RESPONSE TO REQUEST NO. 16:**

7 Objection. The request is compound, vague, ambiguous and
8 unintelligible as phrased . Moreover, the requested documents
9 exceed the scope of permissible discovery because they are not
10 relevant to any issue in this case, and because their production
11 will not lead to the discovery of admissible evidence. Further, the
12 request is not interposed for any legitimate purpose, but solely to
13 harass CSI. Moreover, the requested documents exceed the scope of
14 permissible discovery because they are not relevant to any issue in
15 this case, and because their production will not lead to the
16 discovery of admissible evidence. Further, the request is
17 overbroad, burdensome and oppressive, in that it covers a time
18 period far exceeding the relevant scope of this action, and
19 requests information concerning a person or persons not parties to
20 this action. Further, the request is interposed in bad faith.
21 Armstrong propounded this identical request for documents in the
22 State Action and withdrew it on CSI's objection. Moreover, this
23 request concerns issues which Armstrong raised in a cross-complaint
24 in the State Action as to which demurrer was sustained and
25 Armstrong should not be permitted to re-litigate them here.

26 **REQUEST NO. 17:**

27 All lawsuits, bar complaints or requests for criminal charges
28 filed or made at any time by you against or concerning Michael J.

1 Flynn, his law firm, or any other attorney associated or connected
2 with him or his law firm.

3 **RESPONSE TO REQUEST NO. 17:**

4 Objection. The request is compound, vague, ambiguous and
5 unintelligible as phrased. Moreover, the requested documents exceed
6 the scope of permissible discovery because they are not relevant to
7 any issue in this case, and because their production will not lead
8 to the discovery of admissible evidence. Further, the request is
9 not interposed for any legitimate purpose, but solely to harass
10 CSI. Further, the request is overbroad, burdensome and oppressive,
11 in that it covers a time period far exceeding the relevant scope of
12 this action, and requests information concerning a person or
13 persons not parties to this action. Moreover, this request concerns
14 issues which Armstrong raised in a cross-complaint in the State
15 Action as to which demurrer was sustained and Armstrong should not
16 be permitted to re-litigate them here.

17 **REQUEST NO. 18:**

18 All documents of any kind provided by you at any time in any
19 way or manner whatsoever to any member of the media or to any media
20 company or organization which mention, concern or relate in any way
21 to Ford Greene.

22 **RESPONSE TO REQUEST NO. 18:**

23 See response to Request No. 17.

24 **REQUEST NO. 19:**

25 All bar complaints or requests for criminal charges filed or
26 made by you at any time against or concerning Ford Greene.

27 **RESPONSE TO REQUEST NO. 19:**

28 See Response to Request No. 17.

1 **REQUEST NO. 20:**

2 All documents of any kind provided by you at any time in any
3 way or manner whatsoever to any member of the media or any media
4 company or organization which mention, concern or relate in any way
5 to Judge Paul G. breckenridge, Jr., or his decision of June 20,
6 1984 in Armstrong I.

7 **RESPONSE TO REQUEST NO. 20:**

8 See Response to Request No. 16.

9 **REQUEST NO. 21:**

10 All documents of any kind, including but not limited to
11 evaluations (evals), order, project orders, mission orders, program
12 orders, targets, private investigator (PI) orders, intelligence
13 orders, OSA orders, Guardian Office orders, correspondence,
14 reports, compliance reports, daily reports, battle plans, PI
15 reports, photographs, audio or video recordings, by whatever means
16 and by whatever designation or label, computer records including E-
17 mail, E-files, orders, messages, directories, data, disks, tapes
18 and other computer storage or retrieval designations whatsoever,
19 and any and all stolen documents which concern, refer or relate to,
20 or form part of any intelligence or other operations or actions
21 directed at or relating in any way to Gerald Armstrong; including
22 but not limited to the "Gerald Armstrong Project" involving at
23 least your operatives Sherman, David Kluge, Mike Rinder and your
24 private investigator Eugene M. Ingram; the Gerald Armstrong "London
25 operation" involving at least David Kluge and your private
26 investigators which culminated in a confrontation in Heathrow
27 Airport and sworn affidavits accusing Armstrong of passing stolen
28 documents to Arab agents; the Gerald Armstrong "pc folder

1 operation" in which your operative David Kluge attempted to get
2 Armstrong to accept "stolen" preclear folders; the Gerald Armstrong
3 "Nevada operation" in which your operative Kluge attempted to get
4 Armstrong to travel to Nevada for a "meeting;" the Gerald Armstrong
5 "Renee operation" in which your operatives Sherman and Kluge set up
6 a meeting between armstrong and your operative "Renee;" the "Boston
7 FBI operation" in which your agents attempted to have the false
8 criminal charge of impersonating an FBI officer brought against
9 Armstrong; the "LA DA operation" in which your agents attempted to
10 frame Armstrong with a crime and then pressured the District
11 Attorney into filing charges against him; the "Van Schaick
12 operation" in which you used Michael Flynn's client Levanda Van
13 Schaick to execute a false declaration about Armstrong for the
14 purpose of bringing a contempt of court charge against him; the
15 "crooked lawyer operation" where your operative Kluge took
16 Armstrong to a Glendale lawyer to discuss phony plan of bringing a
17 phony lawsuit against you corrupt leadership to a phony group of
18 phony reformers.

19 **RESPONSE TO REQUEST NO. 21:**

20 Objection. The request is compound, vague, ambiguous and
21 unintelligible as phrased. It is deliberately argumentative and
22 prejudicial, referring to literally dozens of non-existent
23 "operations," which exist only in Armstrong's imagination, in a
24 manner designed to accuse CSI rather than seek discovery. Further,
25 the request is overbroad, burdensome and oppressive, in that it
26 appears to cover a time period far exceeding the relevant scope of
27 this action, and seems to request information concerning persons
28 not parties to this action. Further, the request is not interposed

1 for any legitimate purpose, but solely to harass CSI. Moreover,
2 this request concerns issues which Armstrong raised in a cross-
3 complaint in the State Action as to which demurrer was sustained
4 and Armstrong should not be permitted to re-litigate them here.

5 Notwithstanding these objections, CSI responds that it has no
6 such documents within its possession, custody or control.

7 REQUEST NO. 22:

8 The briefcase and all papers, documents and materials
9 contained therein, including but not limited to the original
10 artwork for a book, the working title for which was "The Hubbard
11 Letters," which were stolen from Armstrong's car trunk in 1984 by
12 your agents.

13 RESPONSE TO REQUEST NO. 22:

14 CSI does not have possession, custody or control of any
15 documents or things responsive to this request. Answering further,
16 CSI does not believe that any such documents or things have ever
17 existed, and objects that this frivolous request was interposed by
18 Armstrong solely to harass CSI and is an abuse of the discovery
19 process.

20 REQUEST NO. 23:

21 All other drawings, art, writing, manuscripts, documents,
22 papers or materials of any kind stolen or tricked from Armstrong at
23 any time by any of your agents or operatives.

24 RESPONSE TO REQUEST NO. 23:

25 See response to Request No. 22.

26 REQUEST NO. 24:

27 All correspondence or documents of any kind received or taken
28 from Gerald Armstrong by your operative Dan Sherman.

1 **RESPONSE TO REQUEST NO. 24:**

2 Objection. The request is compound, vague, ambiguous and
3 unintelligible as phrased. Moreover, the requested documents exceed
4 the scope of permissible discovery because they are not relevant to
5 any issue in this case, and because their production will not lead
6 to the discovery of admissible evidence. It is deliberately
7 argumentative and prejudicial, referring to non-existent
8 "operatives," which exist only in Armstrong's imagination, in a
9 manner designed to accuse CSI rather than seek discovery. Moreover,
10 this request concerns issues which Armstrong raised in a cross-
11 complaint in the State Action as to which demurrer was sustained
12 and Armstrong should not be permitted to re-litigate them here.

13 **REQUEST NO. 25:**

14 All correspondence or documents of any kind received or taken
15 from Gerald Armstrong by your operative David Kluge.

16 **RESPONSE TO REQUEST NO. 25:**

17 See response to Request No. 24.

18 **REQUEST NO. 26:**

19 All correspondence or documents of any kind received or taken
20 from Gerald Armstrong by your operative Renee.

21 **RESPONSE TO REQUEST NO. 26:**

22 See response to Request No. 24.

23 **REQUEST NO. 27:**

24 All GO "Intelligence" or "Information," "intel" or "info, (aka
25 "B-1") files or documents which in any way or manner mention,
26 concern or relate to Gerald Armstrong.

27 **RESPONSE TO REQUEST NO. 27:**

28 CSI does not have possession, custody or control of any

documents responsive to this request.

REQUEST NO. 28:

All OSA files or documents which in any way or manner mention, concern or relate to Gerald Armstrong, including computer records of any kind, E-mail, E-files, orders, messages, directories, data, disks, tapes and other computer storage or retrieval designations whatsoever.

RESPONSE TO REQUEST NO. 28:

See response to Request No. 1.

REQUEST NO. 29:

Any and all of Gerald Armstrong's "ethics files" and all documents contained therein.

RESPONSE TO REQUEST NO. 29:

CSI does not have possession, custody or control of any documents responsive to this request.

REQUEST NO. 30:

Any and all of Gerald Armstrong's "personnel files" and all documents contained therein'

RESPONSE TO REQUEST NO. 30:

CSI does not have possession, custody or control of any documents responsive to this request.

REQUEST NO. 31:

Gerald Armstrong's SO#1 (Standing Order No. 1) file and all documents contained therein.

RESPONSE TO REQUEST NO. 31:

CSI does not have possession, custody or control of any documents responsive to this request.

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1 **REQUEST NO. 32:**

2 Any and all Mission files containing all Project Orders or
3 Mission orders (MO's), reports, and any other documents relating to
4 any missions carried out by Gerald Armstrong as a Sea Organization
5 missionary between the years 1971 and 1981.

6 **RESPONSE TO REQUEST NO. 32:**

7 CSI does not have possession, custody or control of any
8 documents responsive to this request.

9 **REQUEST NO. 33:**

10 All organization publications, including but not limited to
11 Hubbard Communication Office Bulletin ("HCOB's")

12 **RESPONSE TO REQUEST NO. 33:**

13 See response to Request No. 2.

14 **REQUEST NO. 34:**

15 All documents of any kind given by you at any time to any
16 member of the Government of the United States or any other country,
17 or any US or foreign government agency or organ, or state agency or
18 organ, or law enforcement personnel, departments or offices,
19 including but not limited to the Federal Bureau of Investigation,
20 Internal Revenue Services, Los Angeles Police Department, and Los
21 Angeles District Attorney, which mention, concern or relate in any
22 way to Gerald Armstrong.

23 **RESPONSE TO REQUEST NO. 34:**

24 See response to Request No. 2.

25 **REQUEST NO. 35:**

26 All documents providing, recording, reflecting, evidencing or
27 relating to the time, place, identity of your agent provider or
28 transmitter, and means of transmission or provision by you to any

1 member of the Government of the United States or any other country,
2 or any US or foreign government agency or organ, or state agency or
3 organ, or law enforcement personnel, departments or offices,
4 including but not limited to the Federal Bureau of Investigation,
5 Internal Revenue Services, Los Angeles Police Department, and Los
6 Angeles District Attorney, of each and every document of any kind
7 which mentions, concerns or relates in any way to Gerald Armstrong.

8 **RESPONSE TO REQUEST NO. 35:**

9 See response to Request No. 2.

10 **REQUEST NO. 36:**

11 All documents of any kind received by you at any time from any
12 member of the Government of the United States or any other country,
13 or any US or foreign government agency or organ, or state agency or
14 organ, or state agency or organ, or law enforcement personnel,
15 departments or offices, including but not limited to the Federal
16 Bureau of Investigation, Internal Revenue Services, Los Angeles
17 Police Department, and Los Angeles District Attorney, which
18 mention, concern or relate in any way to Gerald Armstrong.

19 **RESPONSE TO REQUEST NO. 36:**

20 See response to Request No. 2.

21 **REQUEST NO. 37:**

22 Each and every document provided or submitted by you at any
23 time to the Internal Revenue Service in support of or concerning
24 any and all applications for or in pursuit of your tax exempt
25 status, including, but not limited to documents provided in or as
26 part of any judicial or administrative proceeding concerning or
27 relating to your application or applications for or in pursuit of
28 your tax exempt status.

1 **RESPONSE TO REQUEST NO. 37:**

2 Objection. The requested documents exceed the scope of
3 permissible discovery because they are not relevant to any issue in
4 this case, and because their production will not lead to the
5 discovery of admissible evidence. Further, the request is
6 overbroad, burdensome and oppressive. All of the requested
7 documents are a matter of public record, and they comprise 21 feet
8 of documentation not relevant to any issue presented by this
9 action. Further, the request is not interposed for any legitimate
10 purpose, but solely to harass CSI.

11 **REQUEST NO. 38:**

12 Any and all documents of any kind which mention, concern or
13 relate in any way to Mission Corporate Category Sort-out,
14 including, but not limited to the audio recordings, and all written
15 transcripts thereof, which are commonly known as the "MCCS Tapes,"
16 and which have been the subject of litigation known as US v. Zolin.

17 **RESPONSE TO REQUEST NO. 38:**

18 Objection. The requested documents exceed the scope of
19 permissible discovery because they are not relevant to any issue in
20 this case, and because their production will not lead to the
21 discovery of admissible evidence. Further, the request is not
22 interposed for any legitimate purpose, but solely to harass CSI.
23 Moreover, this request concerns issues which Armstrong raised in a
24 cross-complaint in the State Action as to which demurrer was
25 sustained and Armstrong should not be permitted to re-litigate them
26 here. Further, the request seeks documents which are privileged
27 pursuant to the attorney-client privilege and the work product
28 doctrine. In addition, the request seeks documents which have been

1 placed under the seal of the Los Angeles Superior Court.

2 Armstrong can have no legitimate basis for requesting
3 production of these documents. The requested audiotapes are
4 recordings of privileged conferences between officials of the
5 Church of Scientology of California and their attorneys, relating
6 to a project that took place during the years 1980 and 1981, ten
7 years prior to any of the events at issue in this action. Nothing
8 on those tapes bears any relevance to Armstrong's conveyance of his
9 assets in 1990. Armstrong's only connection to these audiotapes is
10 that he stole them in 1981 from non-party Church of Scientology of
11 California. Further, the litigation which he cites, United States
12 v. Zolin, has been settled. Neither the IRS nor anyone else is
13 contesting the privileges raised by the Church of Scientology of
14 California in regard to these tapes.

15 Moreover, CSI does not have possession, custody or control of
16 the requested tapes or transcripts thereof.

17 **REQUEST NO. 39:**

18 All orders of any kind from 1981 to the present from any and
19 all of your agents, operatives, employees, officers, directors,
20 ministers, members, units, offices, known or unknown, stated or
21 not, to anyone else anywhere, which in any way mention, concern or
22 relate to Gerald Armstrong.

23 **RESPONSE TO REQUEST NO. 39:**

24 See response to Request No. 1.

25 **REQUEST NO. 40:**

26 All documents of any kind, including but not limited to
27 evaluations (evals), order, project orders, mission orders, program
28 orders, targets, private investigator orders, intelligence orders,

1 OSA orders, GO orders, correspondence, reports, compliance reports,
2 ethics reports, daily reports, briefing reports, debriefing
3 reports, statistic reports, battle plans, private investigator
4 reports, photographs, audio or video recordings, made by whatever
5 means and given whatever designation or label, computer records
6 including E-mail, E-files, orders, messages, directories, data,
7 disks, tapes and other computer storage or retrieval designations
8 whatsoever, from 1969 to the present to or from any and all of your
9 agents, operatives, employees, officers, directors, ministers,
10 members, units, offices, known or unknown, stated or not, to anyone
11 else anywhere, which in any way mention, concern or relate to
12 Gerald Armstrong.

13 **RESPONSE TO REQUEST NO. 40:**

14 See response to Request No. 1.

15 **REQUEST NO. 41:**

16 All documents and materials of any kind removed by Vicki
17 Aznaran or anyone else, acting or not on your orders, from Gerald
18 Armstrong's, aka Gerry Armstrong, pc folders; aka preclear files or
19 folders, auditing or processing files or folders, and/or
20 confessional formularies, in anticipation or not of their delivery,
21 or not, to the Los Angeles Superior Court pursuant or not to any
22 order from any judge of that Court, or for any other reason.

23 **RESPONSE TO REQUEST NO. 41:**

24 CSI does not have possession, custody or control of any
25 documents or things responsive to this request. Answering further,
26 CSI does not believe that any such documents or things have ever
27 existed, and objects that this frivolous request was interposed by
28 Armstrong solely to harass CSI and is an abuse of the discovery

1 process. Moreover, this request concerns issues which Armstrong
2 raised in a cross-complaint in the State Action as to which
3 demurrer was sustained and Armstrong should not be permitted to re-
4 litigate them here.

5 **REQUEST NO. 42:**

6 All documents of any kind, including but not limited to
7 evaluations (evals), order, project orders, mission orders, program
8 orders, targets, private investigator orders, intelligence orders,
9 OSA orders, GO orders, correspondence, reports, compliance reports,
10 ethics reports, daily reports, briefing reports, debriefing
11 reports, statistic reports, battle plans, private investigator
12 reports, photographs, audio or video recordings, made by whatever
13 means and given whatever designation or label, computer records
14 including E-mail, E-files, orders, messages, directories, data,
15 disks, tapes and other computer storage or retrieval designations
16 whatsoever, at any time from or to any and all of your agents,
17 operatives, employees, officers, directors, ministers, members,
18 units, offices, known or unknown, stated or not, to anyone else
19 anywhere, which in any way mention, concern or relate in any way to
20 Los Angeles Superior Court Judge Paul G. Breckenridge, Jr.

21 **RESPONSE TO REQUEST NO. 42:**

22 See response to Request No. 16.

23 **REQUEST NO. 43:**

24 All documents of any kind, including but not limited to
25 evaluations (evals), order, project orders, mission orders, program
26 orders, targets, private investigator orders, intelligence orders,
27 OSA orders, GO orders, correspondence, reports, compliance reports,
28 ethics reports, daily reports, briefing reports, debriefing

1 reports, statistic reports, battle plans, private investigator
2 reports, photographs, audio or video recordings, made by whatever
3 means and given whatever designation or label, computer records
4 including E-mail, E-files, orders, messages, directories, data,
5 disks, tapes and other computer storage or retrieval designations
6 whatsoever, at any time from or to any and all of your agents,
7 operatives, employees, officers, directors, ministers, members,
8 units, offices, known or unknown, stated or not, to anyone else
9 anywhere, which in any way mention, concern or relate in any way to
10 Michael J. Flynn.

11 **RESPONSE TO REQUEST NO. 43:**

12 See response to Request No. 16.

13 **REQUEST NO. 44:**

14 All documents of any kind, including but not limited to
15 evaluations (evals), order, project orders, mission orders, program
16 orders, targets, private investigator orders, intelligence orders,
17 OSA orders, GO orders, correspondence, reports, compliance reports,
18 ethics reports, daily reports, briefing reports, debriefing
19 reports, statistic reports, battle plans, private investigator
20 reports, photographs, audio or video recordings, made by whatever
21 means and given whatever designation or label, computer records
22 including E-mail, E-files, orders, messages, directories, data,
23 disks, tapes and other computer storage or retrieval designations
24 whatsoever, at any time from or to any and all of your agents,
25 operatives, employees, officers, directors, ministers, members,
26 units, offices, known or unknown, stated or not, to anyone else
27 anywhere, which in any way mention, concern or relate in any way to
28 Ford Greene.

1 **RESPONSE TO REQUEST NO. 44:**

2 See response to Request No. 16.

3 **REQUEST NO. 45:**

4 All documents of any kind, including but not limited to
5 evaluations (evals), order, project orders, mission orders, program
6 orders, targets, private investigator orders, intelligence orders,
7 OSA orders, GO orders, correspondence, reports, compliance reports,
8 ethics reports, daily reports, briefing reports, debriefing
9 reports, statistic reports, battle plans, private investigator
10 reports, photographs, audio or video recordings, made by whatever
11 means and given whatever designation or label, computer records
12 including E-mail, E-files, orders, messages, directories, data,
13 disks, tapes and other computer storage or retrieval designations
14 whatsoever, at any time from or to any and all of your agents,
15 operatives, employees, officers, directors, ministers, members,
16 units, offices, known or unknown, stated or not, to anyone else
17 anywhere, which in any way mention, concern or relate in any way to
18 Paul Morantz.

19 **RESPONSE TO REQUEST NO. 45:**

20 See response to Request No. 17.

21 **REQUEST NO. 46:**

22 All documents of any kind, including but not limited to
23 evaluations (evals), order, project orders, mission orders, program
24 orders, targets, private investigator orders, intelligence orders,
25 OSA orders, GO orders, correspondence, reports, compliance reports,
26 ethics reports, daily reports, briefing reports, debriefing
27 reports, statistic reports, battle plans, private investigator
28 reports, photographs, audio or video recordings, made by whatever

1 means and given whatever designation or label, computer records
2 including E-mail, E-files, orders, messages, directories, data,
3 disks, tapes and other computer storage or retrieval designations
4 whatsoever, at any time from or to any and all of your agents,
5 operatives, employees, officers, directors, ministers, members,
6 units, offices, known or unknown, stated or not, to anyone else
7 anywhere, which in any way mention, concern or relate in any way to
8 John Elstead.

9 **RESPONSE TO REQUEST NO. 46:**

10 See response to Request No. 17.

11 **REQUEST NO. 47:**

12 All documents of any kind, including but not limited to
13 evaluations (evals), order, project orders, mission orders, program
14 orders, targets, private investigator orders, intelligence orders,
15 OSA orders, GO orders, correspondence, reports, compliance reports,
16 ethics reports, daily reports, briefing reports, debriefing
17 reports, statistic reports, battle plans, private investigator
18 reports, photographs, audio or video recordings, made by whatever
19 means and given whatever designation or label, computer records
20 including E-mail, E-files, orders, messages, directories, data,
21 disks, tapes and other computer storage or retrieval designations
22 whatsoever, at any time from or to any and all of your agents,
23 operatives, employees, officers, directors, ministers, members,
24 units, offices, known or unknown, stated or not, to anyone else
25 anywhere, which in any way mention, concern or relate in any way to
26 Joseph A. Yanny.

27 **RESPONSE TO REQUEST NO. 47:**

28 See response to Request No. 17.

1 **REQUEST NO. 48:**

2 All documents of any kind, including but not limited to
3 evaluations (evals), order, project orders, mission orders, program
4 orders, targets, private investigator orders, intelligence orders,
5 OSA orders, GO orders, correspondence, reports, compliance reports,
6 ethics reports, daily reports, briefing reports, debriefing
7 reports, statistic reports, battle plans, private investigator
8 reports, photographs, audio or video recordings, made by whatever
9 means and given whatever designation or label, computer records
10 including E-mail, E-files, orders, messages, directories, data,
11 disks, tapes and other computer storage or retrieval designations
12 whatsoever, at any time from or to any and all of your agents,
13 operatives, employees, officers, directors, ministers, members,
14 units, offices, known or unknown, stated or not, to anyone else
15 anywhere, which in any way mention, concern or relate in any way to
16 Toby A. Plevin.

17 **RESPONSE TO REQUEST NO. 48:**

18 See response to Request No. 17.

19 **REQUEST NO. 49:**

20 All documents of any kind, including but not limited to
21 evaluations (evals), order, project orders, mission orders, program
22 orders, targets, private investigator orders, intelligence orders,
23 OSA orders, GO orders, correspondence, reports, compliance reports,
24 ethics reports, daily reports, briefing reports, debriefing
25 reports, statistic reports, battle plans, private investigator
26 reports, photographs, audio or video recordings, made by whatever
27 means and given whatever designation or label, computer records
28 including E-mail, E-files, orders, messages, directories, data,

1 disks, tapes and other computer storage or retrieval designations
2 whatsoever, at any time from or to any and all of your agents,
3 operatives, employees, officers, directors, ministers, members,
4 units, offices, known or unknown, stated or not, to anyone else
5 anywhere, which in any way mention, concern or relate in any way to
6 Michael L. Walton.

7 RESPONSE TO REQUEST NO. 49:

8 See response to Request No. 16.

9 REQUEST NO. 50:

10 All documents of any kind, including but not limited to
11 evaluations (evals), order, project orders, mission orders, program
12 orders, targets, private investigator orders, intelligence orders,
13 OSA orders, GO orders, correspondence, reports, compliance reports,
14 ethics reports, daily reports, briefing reports, debriefing
15 reports, statistic reports, battle plans, private investigator
16 reports, photographs, audio or video recordings, made by whatever
17 means and given whatever designation or label, computer records
18 including E-mail, E-files, orders, messages, directories, data,
19 disks, tapes and other computer storage or retrieval designations
20 whatsoever, at any time from or to any and all of your agents,
21 operatives, employees, officers, directors, ministers, members,
22 units, offices, known or unknown, stated or not, to anyone else
23 anywhere, which in any way mention, concern or relate in any way to
24 Charles B. O'Reilly.

25 RESPONSE TO REQUEST NO. 50:

26 See response to Request No. 17.

27 REQUEST NO. 51:

28 All documents reflecting, evidencing or relating to any and

1 all financial expenditures by you of any kind or nature, including,
2 but not limited to, wages, fees, charges, costs, payments,
3 deposits, advances, transfers or donations, for, or relating in any
4 way to, actions or things of any kind or nature, including, but not
5 limited to work, services, products, operations, communications,
6 evaluations, executions, missions, projects, transportation,
7 publications, writings, transmissions, disseminations, which
8 mention, concern or relate in any way to Judge Paul G.
9 Breckenridge, Jr., Michael J. Flynn, Bruce Bunch, Michael Tabb,
10 Julia Dragojevic, Ford Greene, Paul Morantz, John Elstead, Toby
11 Plevin, Joseph A. Yanny, Michael L. Walton and Charles B. O'Reilly,
12 made at any time to anyone or any entity, including, but not
13 limited to attorneys, law firms, brokers, contractors, developers,
14 private investigators, private investigator firms, agents, agencies
15 operatives, case officers, cutouts, your employees, your directors,
16 and businesses or other entities including printers, mail services,
17 suppliers, communications companies, and airline companies.

18 **RESPONSE TO REQUEST NO. 51:**

19 See response to Request No. 16.

20 **REQUEST NO. 52:**

21 All organization publications, including but not limited to
22 Hubbard Communication Office Bulletins ("HCOB's"), Hubbard
23 Communication Office Policy Letters ("HCOPL's," or "PL's"),
24 Executive Directives ("ED's"), Condition Orders, Orders, Project
25 Orders, Mission Orders, Program Orders, GO Orders and Directives,
26 OSA Orders and Directives, CST Orders and Directives, CMO Orders
27 and Directives, RTC Orders and Directives, CST Orders and
28 Directives, "Freedom," "Membership News" and all other magazines,

1 periodicals, handouts, "DA documents," or :DA packs," which in any
2 way or manner whatsoever contain any mention of, or concern or
3 relate to, Judge Paul G. Breckenridge, Jr., Michael Flynn, Bruce
4 Bunch, Michael Tabb, Julia Dragojevic, Ford Greene, Paul Morantz,
5 John Elstead, Toby Plevin, Joseph A. Yanny, Michael L. Walton and
6 Charles B. O'Reilly.

7 **RESPONSE TO REQUEST NO. 52:**

8 See response to Request No. 17.

9 **REQUEST NO. 53:**

10 All documents of any kind, including but not limited to
11 evaluations (evals), order, project orders, projects orders,
12 mission orders, program orders, targets, private investigator
13 orders, intelligence orders, OSA orders, GO orders, correspondence,
14 reports, compliance reports, ethics reports, daily reports,
15 briefing reports, debriefing reports, statistic reports, battle
16 plans, private investigator reports, photographs, audio or video
17 recordings, made by whatever means and given whatever designation
18 or label, computer records including E-mail, E-files, orders,
19 messages, directories, data, disks, tapes and any other computer
20 storage or retrieval designations whatsoever, at any time from or
21 to any and all of your agents, operatives, employees, officers,
22 directors, ministers, members, units, offices, known or unknown,
23 stated or not, to anyone else anywhere, which in any way mention,
24 concern or relate in any way to Bent Corydon, Omar V. Garrison,
25 Laurel Sullivan, William Franks, Howard Schomer, Michael Douglas,
26 Malcolm Nothling, Gary M. Bright, Jerold Fagelbaum, David Mayo,
27 John Nelson, Harvey Haber, Vivian Zegel, Dede Reisdorf, Robin
28 Scott, Vickie Aznaran, Richard Aznaran, Jonathan Atack, Lawrence

1 wollersheim, bob Penny, Dennis Erlich, Arnie Lerma, Margery
2 Wakefield, Enid Vien, Gabriel Cazares, Nancy McLean, John McLean,
3 Ronald Lawley, Steven Fishman, Uwe Geertz, Ph.D., Margaret Singer,
4 Ph.D., Garry Scarff, Cynthia Kisser, Priscilla Coates, John Clark,
5 M.D., Edward Lottick, M.D., Robert Vaughn Young, Stacy Young, Hana
6 Whitfield, Jerry Whitfield.

7 **RESPONSE TO REQUEST NO. 53:**

8 See response to Request No. 17.

9 **REQUEST NO. 54:**

10 All documents reflecting, evidencing or relating to any and
11 all financial expenditures by you of any kind or nature, including,
12 but not limited to, wages, fees, charges, costs, payments,
13 deposits, advances, transfers or donations, for, or relating in any
14 way to, actions or thing of any kind or nature, including, but not
15 limited to work, services, products, operations, communications,
16 evaluations, executions, missions, projects, transportation,
17 publications, writings, transmissions, disseminations, which
18 mention, concern or relate in any way to Bent Corydon, Omar V.
19 Garrison, Laurel Sullivan, William Franks, Howard Schomer, Michael
20 Douglas, Malcolm Nothling, Gary M. Bright, Jerold Fagelbaum, David
21 Mayo, John Nelson, Harvey Haber, Vivian Zegel, Dede Reisdorf, Robin
22 Scott, Vickie Aznaran, Richard Aznaran, Jonathan Attack, Lawrence
23 Wollersheim, Bob Penny, Dennis Erlich, Arnie Lerma, Margery
24 Wakefield, Enid Vien, Gabriel Cazares, Nancy McLean, John McLean,
25 Ronald Lawley, Steven Fishman, Uwe Geertz, Ph.D., Margaret Singer,
26 Ph.D., Garry Scarff, Cynthia Kisser, Priscilla Coates, John Clark,
27 M.D., Edward Lottick, M.D., Robert Vaughn Young, Stacy Young, Hana
28 Whitfield, Jerry Whitfield, made at any time to anyone or any

1 entity, including, but not limited to attorneys, law firms,
2 brokers, contractors, developers, private investigators, private
3 investigator firms, agents, agencies, operatives, case officers,
4 cutouts, your employees, your directors, and businesses or other
5 entities including printers, mail services, suppliers,
6 communications companies, and airline companies.

7 RESPONSE TO REQUEST NO. 54:

8 See response to Request No. 17.

9 REQUEST NO. 55:

10 All organization publications, including but not limited to
11 Hubbard Communication Office Bulletins ("HCOB's"), Hubbard
12 Communication Office Policy Letters ("HCOPL's," or "PL's"),
13 Executive Directives ("ED's"), Condition Orders, Orders, Project
14 Orders, Mission Orders, Program Orders, GO Orders and Directives,
15 OSA Orders and Directives, CMO Orders and Directives, RTC Orders
16 and Directives, CST Orders and Directives, "Freedom," "Membership
17 News" and all other magazines, periodicals, handouts, "DA
18 documents," or "DA packs," which in any way or manner whatsoever
19 contain any mention of, or concern or relate to Bent Corydon, Omar
20 V. Garrison, Laurel Sullivan, William Franks, Howard Schomer,
21 Michael Douglas, Malcolm Nothling, Gary M. Bright, Jerold
22 Fagelbaum, David Mayo, John Nelson, Harvey Haber, Vivian Zegel,
23 Dede Reisdorf, Robin Scott, Vickie Aznaran, Richard Aznaran,
24 Jonathan Attack, Lawrence Wollersheim, Bob Penny, Dennis Erlich,
25 Arnie Lerma, Margery Wakefield, Enid Vien, Gabriel Cazares, Nancy
26 McLean, John McLean, Ronald Lawley, Steven Fishman, Uwe Geertz,
27 Ph.D., Margaret Singer, Ph.D., Garry Scarff, Cynthia Kisser,
28 Priscilla Coates, John Clark, M.D., Edward Lottick, M.D., Robert

1 Vaughn Young, Stacy Young, Hana Whitfield, Jerry Whitfield.

2 RESPONSE TO REQUEST NO. 55:

3 See response to Request No. 17.

4 REQUEST NO. 56:

5 Any and all Flag Conditions orders (FCO's) or any other
6 Conditions Orders or Ethics Orders of any kind which mention, refer
7 or relate in any way to "Suppressive Persons," aka "SP's," or
8 anyone labelled "suppressive, a "suppressive person," or "SP."

9 RESPONSE TO REQUEST NO. 56:

10 Objection. The requested documents exceed the scope of
11 permissible discovery because they are not relevant to any issue in
12 this case, and because their production will not lead to the
13 discovery of admissible evidence. Moreover, the request is vague,
14 ambiguous, incomprehensible and unintelligible. Further, the
15 request is overbroad, burdensome and oppressive. Moreover, the
16 request is not interposed for any legitimate purpose, but solely to
17 harass CSI. Further, the request is interposed in bad faith.
18 Armstrong propounded this identical request for documents in the
19 State Action and withdrew it on CSI's objection. Moreover, this
20 request concerns issues which Armstrong raised in a cross-complaint
21 in the State Action as to which demurrer was sustained and
22 Armstrong should not be permitted to re-litigate them here.
23 Moreover, the request calls for production of documents in
24 violation of the privacy and association rights of plaintiff and
25 others pursuant to the California and United States constitutions.
26 Further, the request seeks documents in violation of the right of
27 plaintiff and its parishioners to freely practice their religion
28 pursuant to the First Amendment to the United States Constitution.

1 **REQUEST NO. 57:**

2 All documents of any kind, including but not limited to
3 evaluations (evals), order, project orders, mission orders, program
4 orders, targets, private investigator orders, intelligence orders,
5 OSA orders, GO orders, correspondence, reports, compliance reports,
6 ethics reports, daily reports, battle plans, private investigator
7 reports, photographs, audio or video recordings, made by whatever
8 means and given whatever designation or label, computer records
9 including E-mail, E-files, orders, messages, directories, data,
10 disks, tapes and other computer storage or retrieval designations
11 whatsoever, at any time from or to any and all of your agents,
12 operatives, employees, officers, directors, ministers, members,
13 units, offices, known or unknown, stated or not, to anyone else
14 anywhere, which in any way mention, concern or relate in any way to
15 FACTNet, aka FACT, or "Fight Against Coercive Therapies."

16 **RESPONSE TO REQUEST NO. 57:**

17 See response to Request No. 17.

18 **REQUEST NO. 58:**

19 All documents of any kind, including but not limited to
20 evaluations (evals), order, project orders, mission orders, program
21 orders, targets, private investigator orders, intelligence orders,
22 OSA orders, GO orders, correspondence, reports, compliance reports,
23 ethics reports, daily reports, briefing reports, debriefing
24 reports, statistic reports, battle plans, private investigator
25 reports, photographs, audio or video recordings, made by whatever
26 means and given whatever designation or label, computer records
27 including E-mail, E-files, orders, messages, directories, data,
28 disks, tapes and other computer storage or retrieval designations

1 whatsoever, at any time from or to any and all of your agents,
2 operatives, employees, officers, directors, ministers, members,
3 units, offices, known or unknown, stated or not, to anyone else
4 anywhere, which in any way mention, concern or relate in any way to
5 CAN, aka "Cult Awareness Network."

6 **RESPONSE TO REQUEST NO. 58:**

7 See response to Request No. 17.

8 **REQUEST NO. 59:**

9 All documents of any kind, including but not limited to
10 evaluations (evals), order, project orders, mission orders, program
11 orders, targets, private investigator orders, intelligence orders,
12 OSA orders, GO orders, correspondence, reports, compliance reports,
13 ethics reports, daily reports, briefing reports, debriefing
14 reports, statistic reports, battle plans, private investigator
15 reports, photographs, audio or video recordings, made by whatever
16 means and given whatever designation or label, computer records
17 including E-mail, E-files, orders, messages, directories, data,
18 disks, tapes and other computer storage or retrieval designations
19 whatsoever, at any time from or to any and all of your agents,
20 operatives, employees, officers, directors, ministers, members,
21 units, offices, known or unknown, stated or not, to anyone else
22 anywhere, which in any way mention, concern or relate in any way to
23 AFF, aka "American Family Foundation."

24 **RESPONSE TO REQUEST NO. 59:**

25 See response to Request No. 17.

26 **REQUEST NO. 60:**

27 Any and all HCOB's, PL's, Directives, Orders, Conditions
28 Orders, Program Orders, Project Orders, Missions Orders, GO Orders,

1 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
2 Directives, or any other issue type, whether canceled or revised at
3 any time, which mention, refer to or relate in any way to SP's
4 and/or the treatment or handling of SP's, as that term is used and
5 understood in your writings and jargon.

6 **RESPONSE TO REQUEST NO. 60:**

7 Objection. The requested documents exceed the scope of
8 permissible discovery because they are not relevant to any issue in
9 this case, and because their production will not lead to the
10 discovery of admissible evidence. The request is compound, vague,
11 ambiguous and unintelligible as phrased. Further, the request is
12 overbroad, burdensome and oppressive. Further, the request is not
13 interposed for any legitimate purpose, but solely to harass CSI.
14 Further, this request violates the constitutional associational and
15 privacy rights of CSI and others pursuant to the California and
16 United States constitutions. Moreover, the request seeks documents
17 in violation of the right of CSI and its parishioners to freely
18 practice their religion pursuant to the First Amendment to the
19 United States Constitution and the California Constitution.
20 Further, the request is duplicative, and interposed in bad faith,
21 solely to harass CSI. Moreover, this request concerns issues which
22 Armstrong raised in a cross-complaint in the State Action as to
23 which demurrer was sustained and Armstrong should not be permitted
24 to re-litigate them here.

25 Further, CSI has already produced non-privileged documents
26 responsive to this request to Armstrong in the State Action.

27 **REQUEST NO. 61:**

28 Any and all HCOB's, PL's, Directives, Orders, Conditions

1 Orders, Program Orders, Project Orders, Missions Orders, GO Orders,
2 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
3 Directives, or any other issue type, whether canceled or revised at
4 any time, which mention, refer to or relate in any way to
5 "squirrels" as that term is commonly understood in your writings
6 and jargon.

7 **RESPONSE TO REQUEST NO. 61:**

8 See response to Request No. 60.

9 **REQUEST NO. 62:**

10 Any and all HCOB's, PL's, Directives, Orders, Conditions
11 Orders, Program Orders, Project Orders, Missions Orders, GO Orders,
12 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
13 Directives, or any other issue type, whether canceled or revised at
14 any time, which mention, refer to or relate in any way to the non-
15 Scientology justice system of the United States or any other nation
16 (aka "wog justice").

17 **RESPONSE TO REQUEST NO. 62:**

18 See response to Request No. 60.

19 **REQUEST NO. 63:**

20 Any and all HCOB's, PL's, Directives, Orders, Conditions
21 Orders, Program Orders, Project Orders, Missions Orders, GO Orders,
22 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
23 Directives, or any other issue type, whether canceled or revised at
24 any time, which mention, refer to or relate in any way to
25 espionage, intelligence, intelligence operations, covert
26 operations, under cover operations, intelligence agents or
27 operatives, case officers or black propaganda, black PR or black PR
28 campaigns.

1 **RESPONSE TO REQUEST NO. 63:**

2 Objection. The requested documents exceed the scope of
3 permissible discovery because they are not relevant to any issue in
4 this case, and because their production will not lead to the
5 discovery of admissible evidence. The request is compound, vague,
6 ambiguous and unintelligible as phrased. Further, the request is
7 overbroad, burdensome and oppressive. Further, the request is not
8 interposed for any legitimate purpose, but solely to harass CSI.
9 Further, the request is interposed in bad faith. Armstrong
10 propounded this identical request for documents in the State Action
11 and withdrew it on CSI's objection. Moreover, this request concerns
12 issues which Armstrong raised in a cross-complaint in the State
13 Action as to which demurrer was sustained and Armstrong should not
14 be permitted to re-litigate them here.

15 **REQUEST NO. 64:**

16 Any and all HCOB's, PL's, Directives, Orders, Conditions
17 Orders, Program Orders, Project Orders, Missions Orders, GO Orders,
18 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
19 Directives, or any other issue type, whether canceled or revised at
20 any time, which mention, refer to or relate in any way to real or
21 imagined, named or not named, "enemies," opponents, opposition of
22 yours.

23 **RESPONSE TO REQUEST NO. 64:**

24 See response to Request No. 63.

25 **REQUEST NO. 65:**

26 Any and all HCOB's, PL's, Directives, Orders, Conditions
27 Orders, Program Orders, Project Orders, Missions Orders, GO Orders,
28 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or

1 Directives, or any other issue type, whether canceled or revised at
2 any time, which mention, refer to or relate in any way to judges of
3 local, state and federal courts in the United States or any other
4 nation (aka "wog" judges), whether named or not and/or intelligence
5 or public relations "handlings" of any such judges, whether named
6 or not.

7 **RESPONSE TO REQUEST NO. 65:**

8 Objection. The requested documents exceed the scope of
9 permissible discovery because they are not relevant to any issue in
10 this case, and because their production will not lead to the
11 discovery of admissible evidence. The request is compound, vague,
12 ambiguous and unintelligible as phrased. Further, the request is
13 overbroad, burdensome and oppressive. Further, the request is not
14 interposed for any legitimate purpose, but solely to harass CSI.
15 Moreover, this request concerns issues which Armstrong raised in a
16 cross-complaint in the State Action as to which demurrer was
17 sustained and Armstrong should not be permitted to re-litigate them
18 here.

19 Notwithstanding these objections, and to the extent that CSI
20 understands this request, CSI responds that it has no such
21 documents within its possession, custody or control.

22 **REQUEST NO. 66:**

23 All documents of any kind, including but not limited to
24 evaluations (evals), order, project orders, mission orders, program
25 orders, targets, private investigator orders, intelligence orders,
26 OSA orders, GO orders, correspondence, reports, compliance reports,
27 ethics reports, daily reports, briefing reports, debriefing
28 reports, statistic reports, battle plans, private investigator

1 reports, photographs, audio or video recordings, made by whatever
2 means and given whatever designation or label, computer records
3 including E-mail, E-files, orders, messages, directories, data,
4 disks, tapes and other computer storage or retrieval designations
5 whatsoever, at any time from or to any and all of your agents,
6 operatives, employees, officers, directors, ministers, members,
7 units, offices, known or unknown, stated or not, to anyone else
8 anywhere, which in any way mention, concern or relate in any way to
9 any judge who presided on any case of any kind in which you were a
10 party, including, but not limited to US District Judges Ideman,
11 Ritchey and Krentzman.

12 **RESPONSE TO REQUEST NO. 66:**

13 See response to Request No. 65.

14 **REQUEST NO. 67:**

15 Any and all HCOB's, PL's, Directives, Orders, Conditions
16 Orders, Program Orders, Project Orders, Missions Orders, GO Orders,
17 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
18 Directives, or any other issue type, whether canceled or revised at
19 any time, which mention, refer to or relate in any way to
20 litigation, litigating and using the courts and law, or "wog
21 courts" or "wog justices" system to harass.

22 **RESPONSE TO REQUEST NO. 67:**

23 See response to Request No. 63.

24 **REQUEST NO. 68:**

25 Any and all HCOB's, PL's, Directives, Orders, Conditions
26 Orders, Program Orders, Project Orders, Missions Orders, GO Orders,
27 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
28 Directives, or any other issue type, whether canceled or revised at

1 any time, which mention, refer to or relate in any way to private
2 investigators, their hiring, their operating or running, and their
3 use against perceived enemies or opponents by Scientology.

4 **RESPONSE TO REQUEST NO. 68:**

5 See response to Request No. 65.

6 **REQUEST NO. 69:**

7 Any and all HCOB's, PL's Directives, Orders, Conditions
8 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
9 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
10 Directives, or any other issue type, whether canceled or revised at
11 any time which mention, refer to or relate in any way to penalties
12 or ethics penalties, or punishment or ethics punishment,
13 "conditions" or ethics conditions.

14 **RESPONSE TO REQUEST NO. 69:**

15 See response to Request No. 60.

16 **REQUEST NO. 70:**

17 Any and all documents establishing, governing, concerning,
18 mentioning or relating in any way to the Rehabilitation Project
19 Force ("RPF"), from 1974 to the present, including, but not limited
20 to security checks, aka "sec checks," Flag Orders, Flag Conditions
21 Orders, the FO 3434 series.

22 **RESPONSE TO REQUEST NO. 70:**

23 See response to Request No. 60.

24 **REQUEST NO. 71:**

25 Any and all HCOB's, PL's, Directives, Orders, Conditions
26 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
27 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
28 Directives, or any other issue type, whether canceled or revised at

1 any time which mention, refer to or relate in any way to mental
2 health, mental healing, knowledge of mental health and healing,
3 and/or the taking over, intended taking over or domination of the
4 field of mental health by you.

5 RESPONSE TO REQUEST NO. 71:

6 See response to Request No. 63.

7 REQUEST NO. 72:

8 Any and all HCOB's, PL's, Directives, Orders, Conditions
9 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
10 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
11 Directives, or any other issue type, whether canceled or revised at
12 any time which mention, refer to or relate in any way to rockslams
13 (aka R/Ses), their meaning, and the consequences of such
14 occurrences to staff members undergoing auditing.

15 RESPONSE TO REQUEST NO. 72:

16 See response to Request No. 60.

17 REQUEST NO. 73:

18 All documents of any kind on which you based your publication
19 "Squirrels" which listed Armstrong as one of six such "squirrels."

20 RESPONSE TO REQUEST NO. 73:

21 See response to Request No. 63.

22 REQUEST NO. 74:

23 All documents of any kind on which the you based any and all
24 of your claims concerning Armstrong in the case of RTC v. Yanny
25 (commonly known as Yanny II).

26 RESPONSE TO REQUEST NO. 74:

27 Objection. The requested documents exceed the scope of
28 permissible discovery because they are not relevant to any issue in

1 this case, and because their production will not lead to the
2 discovery of admissible evidence. Further, the request is
3 overbroad, burdensome and oppressive. Moreover, the request
4 violates the work-product privilege and the attorney-client
5 privilege. Further, the request is not interposed for any
6 legitimate purpose, but solely to harass CSI. Moreover, this
7 request concerns issues which Armstrong raised in a cross-complaint
8 in the State Action as to which demurrer was sustained and
9 Armstrong should not be permitted to re-litigate them here.

10 **REQUEST NO. 75:**

11 All documents of any kind on which you based any and all of
12 your claims concerning Armstrong contained in the affidavits of
13 Kenneth Long and Sheila Chaleff or any other documents filed in the
14 case of Church of Scientology of California v. Russel Miller &
15 Penguin Books in London, England.

16 **RESPONSE TO REQUEST NO. 75:**

17 See response to Request No. 12.

18 **REQUEST NO. 76:**

19 All correspondence, orders or documents of any kind which
20 mention, concern or relate in any way to Gerald Armstrong which
21 were given or delivered at any time and in any way or manner to any
22 private investigator, intelligence agent or any other agent or
23 person employed or not by you.

24 **RESPONSE TO REQUEST NO. 76:**

25 Objection. The requested documents exceed the scope of
26 permissible discovery because they are not relevant to any issue in
27 this case, and because their production will not lead to the
28 discovery of admissible evidence. The request is compound, vague,

1 ambiguous and unintelligible as phrased. Further, the request is
2 not interposed for any legitimate purpose, but solely to harass
3 CSI. Moreover, the request violates the work-product privilege and
4 the attorney-client privilege. Further, the request is
5 duplicative, and interposed in bad faith, solely to harass CSI.
6 Armstrong propounded this identical request for documents in the
7 State Action, and withdrew it on CSI's objection. Moreover, this
8 request concerns issues which Armstrong raised in a cross-complaint
9 in the State Action as to which demurrer was sustained and
10 Armstrong should not be permitted to re-litigate them here.

11 **REQUEST NO. 77:**

12 All correspondence, reports or documents of any kind which
13 mention, concern or relate in any way to Gerald Armstrong which
14 were received at any time by you, or agents, operatives or attorneys
15 of yours, from any private investigator, intelligence agent or any
16 other agent or person employed or not by you.

17 **RESPONSE TO REQUEST NO. 77:**

18 See response to Request No. 12.

19 **REQUEST NO. 78:**

20 Any and all photographs of Gerald Armstrong.

21 **RESPONSE TO REQUEST NO. 78:**

22 See response to Request No. 12.

23 **REQUEST NO. 79:**

24 Any and all videotapes and/or audiotapes, in their entirety
25 and all edited or altered versions thereof, which mention, contain
26 the likeness of, or related in any way to Gerald Armstrong.

27 **RESPONSE TO REQUEST NO. 79:**

28 See response to Request No. 12.

1 **REQUEST NO. 80:**

2 All documents on which you based the statements in the
3 document described as the "Bent Corydon dead agent pack," which
4 concern or relate in any way to Gerald Armstrong.

5 **RESPONSE TO REQUEST NO. 80:**

6 See response to Request No. 63.

7 **REQUEST NO. 81:**

8 All documents which state, show or reflect the relationship of
9 David Miscavige to each component of Scientology listed in
10 definition no. 5, above.

11 **RESPONSE TO REQUEST NO. 81:**

12 See response to Request No. 60.

13 **REQUEST NO. 82:**

14 All documents of any kind, including but not limited to
15 evaluations (evals), orders, project orders, missions orders,
16 program orders, targets, private investigator orders, intelligence
17 orders, OSA orders, GO orders, correspondence, reports, compliance
18 reports, ethics reports, daily reports, briefing reports,
19 debriefing reports, statistic reports, battle plans, private
20 investigator reports, photographs, audio or video recordings, made
21 by whatever means and given whatever designation or label, computer
22 records including E-mail, E-files, orders, messages, directories,
23 data, disks, tapes and any other computer storage or retrieval
24 designations whatsoever, at any time to any and all of your agents,
25 operatives, employees, officers, directors, ministers, members,
26 units, offices, known or unknown, stated or not, or anyone else
27 anywhere, from David Miscavige which mention, concern or relate in
28 any way to Gerald Armstrong.

1 **RESPONSE TO REQUEST NO. 82:**

2 See response to Request No. 65.

3 **REQUEST NO. 83:**

4 All documents of any kind, including but not limited to
5 evaluations (evals), orders, project orders, missions orders,
6 program orders, targets, private investigator orders, intelligence
7 orders, OSA orders, GO orders, correspondence, reports, compliance
8 reports, ethics reports, daily reports, briefing reports,
9 debriefing reports, statistic reports, battle plans, private
10 investigator reports, photographs, audio or video recordings, made
11 by whatever means and given whatever designation or label, computer
12 records including E-mail, E-files, orders, messages, directories,
13 data, disks, tapes and any other computer storage or retrieval
14 designations whatsoever, at any time to any and all of your agents,
15 operatives, employees, officers, directors, ministers, members,
16 units, offices, known or unknown, stated or not, or anyone else
17 anywhere, to David Miscavige which mention, concern or relate in
18 any way to Gerald Armstrong.

19 **RESPONSE TO REQUEST NO. 83:**

20 See response to Request No. 65.

21 **REQUEST NO. 84:**

22 All documents of any kind on which David Miscavige based each
23 and every one of his allegations concerning Armstrong in
24 Miscavige's declaration executed February 8, 1994 for filing in the
25 case of Scientology v. Geertz, USDC for the Central District of
26 California, No. CV 91-6426 HLH(Tx).

27 **RESPONSE TO REQUEST NO. 84:**

28 Objection. The requested documents exceed the scope of

1 permissible discovery because they are not relevant to any issue in
2 this case, and because their production will not lead to the
3 discovery of admissible evidence. Moreover, the request is
4 compound, vague, ambiguous and unintelligible as phrased. Further,
5 the request is not interposed for any legitimate purpose, but
6 solely to harass CSI. Moreover, this request concerns issues which
7 Armstrong raised in a cross-complaint in the State Action as to
8 which CSI obtained summary judgment, and Armstrong should not be
9 permitted to re-litigate them here.

10 **REQUEST NO. 85:**

11 All documents on which your agent Eugene M. Ingram based his
12 statement that Gerald Armstrong has AIDS.

13 **RESPONSE TO REQUEST NO. 85:**

14 See response to Request No. 63.

15 **REQUEST NO. 86:**

16 All documents on which you base your assertion that Gerald
17 Armstrong is an SP.

18 **RESPONSE TO REQUEST NO. 86:**

19 See response to Request No. 12.

20 **REQUEST NO. 87:**

21 All documents, including but not limited to the handwritten
22 documents by L. Ron Hubbard commonly known as the "affirmations, or
23 "admissions," which contain Hubbard's statements that all men are
24 his slaves and that he had the right to use men's minds as he
25 wished and to be merciless.

26 **RESPONSE TO REQUEST NO. 87:**

27 Objection. The request is compound, vague, ambiguous and
28 unintelligible as phrased. Moreover, the requested documents exceed

1 the scope of permissible discovery because they are not relevant to
2 any issue in this case, and because their production will not lead
3 to the discovery of admissible evidence. It is deliberately
4 argumentative and prejudicial, phrased in a manner designed to
5 accuse CSI rather than seek discovery. Further, the request is
6 overbroad, burdensome and oppressive, in that it appears to cover
7 a time period far exceeding the relevant scope of this action, and
8 seems to request information concerning persons not parties to this
9 action. Further, the request is not interposed for any legitimate
10 purpose, but solely to harass CSI. Armstrong propounded this
11 identical request for documents in the State Action, and withdrew
12 it on CSI's objection. Moreover, this request concerns issues which
13 Armstrong raised in a cross-complaint in the State Action as to
14 which demurrer was sustained and Armstrong should not be permitted
15 to re-litigate them here.

16 Notwithstanding these objections, CSI responds that it has no
17 such documents within its possession, custody or control.

18 **REQUEST NO. 88:**

19 All documents on which you base the assertion that you can
20 brain wash faster than the Russians and can produce total amnesia
21 in twenty seconds.

22 **RESPONSE TO REQUEST NO. 88:**

23 See response to Request No. 87.

24 **REQUEST NO. 89:**

25 All documents on which you base your assertions that L. Ron
26 Hubbard was not a pathological liar.

27 **RESPONSE TO REQUEST NO. 89:**

28 Objection. The request is compound, vague, ambiguous and

1 unintelligible as phrased. Moreover, the requested documents exceed
2 the scope of permissible discovery because they are not relevant to
3 any issue in this case, and because their production will not lead
4 to the discovery of admissible evidence. It is deliberately
5 argumentative and prejudicial, phrased in a manner designed to
6 accuse CSI rather than seek discovery. Further, the request is
7 overbroad, burdensome and oppressive, in that it appears to cover
8 a time period far exceeding the relevant scope of this action, and
9 seems to request information concerning persons not parties to this
10 action. Further, the request is not interposed for any legitimate
11 purpose, but solely to harass CSI. Armstrong propounded this
12 identical request for documents in the State Action, and withdrew
13 it on CSI's objection. Moreover, this request concerns issues which
14 Armstrong raised in a cross-complaint in the State Action as to
15 which demurrer was sustained and Armstrong should not be permitted
16 to re-litigate them here.

17 **REQUEST NO. 90:**

18 All documents on which you base your assertion in the November
19 1989 declaration of Lawrence Heller that "one of the key
20 ingredients to completing these (December 1986) settlements,
21 insisted upon by all parties involved, was strict confidentiality
22 respecting: (1) the Scientology parishioner or staff member's
23 experiences within the Church of Scientology; (2) any knowledge
24 possessed by the Scientology entities concerning those staff
25 members or parishioners; and (3) the terms and conditions of the
26 settlements themselves."

27 **RESPONSE TO REQUEST NO. 90:**

28 Objection. The requested documents exceed the scope of

1 permissible discovery because they are not relevant to any issue in
2 this case, and because their production will not lead to the
3 discovery of admissible evidence. Further, the request is
4 overbroad, burdensome and oppressive. The request is compound,
5 vague, ambiguous and unintelligible as phrased. Further, the
6 request seeks documents concerning events which never occurred, and
7 so is incapable of response. Mr. Heller's declaration does not
8 make the assertion supposedly quoted by defendant.

9 **REQUEST NO. 91:**

10 All documents on which you base your allegations concerning
11 Armstrong in your complaint filed in 1991 in the case of
12 Scientology v. Xanthos, US District Court, Central District of
13 California, Case No. 91-4301-SVW (tx).

14 **RESPONSE TO REQUEST NO. 91:**

15 See response to Request No. 84.

16 **REQUEST NO. 92:**

17 All documents on which you base your assertion that your
18 agents, staff or members do not cull preclear folders, do not
19 provide the supposedly confidential statements of individuals
20 undergoing auditing to organization executives, personnel in their
21 legal or intelligence branches and hired private investigators, and
22 do not use such supposedly confidential statements against said
23 individuals who have undergone auditing for any purpose whatsoever
24 and/or in any circumstances whatsoever.

25 **RESPONSE TO REQUEST NO. 92:**

26 See response to Request No. 89.

27 **REQUEST NO. 93:**

28 Any and all documents which comprise, show, evidence, reflect,

1 concern or relate in any way to your claim that auditing raises the
2 intelligence quotient of people undergoing it; i.e., "preclears,"
3 or "auditees," one point per hours of auditing.

4 **RESPONSE TO REQUEST NO. 93:**

5 Objection. The requested documents exceed the scope of
6 permissible discovery because they are not relevant to any issue in
7 this case, and because their production will not lead to the
8 discovery of admissible evidence. The request is compound, vague,
9 ambiguous and unintelligible as phrased. Further, the request is
10 overbroad, burdensome and oppressive. Further, the request is not
11 interposed for any legitimate purpose, but solely to harass CSI.
12 This request is deliberately argumentative and prejudicial, based
13 on Armstrong's imagination and intended to accuse plaintiff by
14 creating a false "assertion" rather than seek discovery. The
15 request is frivolous and imposed by defendant Armstrong not for any
16 legitimate discovery purpose but solely to harass plaintiff and is
17 an abuse of the discovery process. Further, this request violates
18 the constitutional associational and privacy rights of CSI and
19 others pursuant to the California and United States constitutions.
20 Moreover, the request seeks documents in violation of the right of
21 CSI and its parishioners to freely practice their religion pursuant
22 to the First Amendment to the United States Constitution and the
23 California Constitution.

24 **REQUEST NO. 94:**

25 Any and all documents which comprise, show, evidence, reflect,
26 concern or relate in any way to any and all research or tests done
27 at any time which gave rise to or supports your claim that auditing
28 raises the intelligence quotient of people undergoing it; i.e.,

1 "preclears," or "auditees," one point per hours of auditing.

2 **RESPONSE TO REQUEST NO. 94:**

3 Objection. The requested documents exceed the scope of
4 permissible discovery because they are not relevant to any issue in
5 this case, and because their production will not lead to the
6 discovery of admissible evidence. The request is compound, vague,
7 ambiguous and unintelligible as phrased. Further, the request is
8 overbroad, burdensome and oppressive. Further, the request is not
9 interposed for any legitimate purpose, but solely to harass CSI.
10 This request is deliberately argumentative and prejudicial, based
11 on Armstrong's imagination and intended to accuse plaintiff by
12 creating a false "assertion" rather than seek discovery. The
13 request is frivolous and imposed by defendant Armstrong not for any
14 legitimate discovery purpose but solely to harass plaintiff and is
15 an abuse of the discovery process. Further, this request violates
16 the constitutional associational and privacy rights of CSI and
17 others pursuant to the California and United States constitutions.
18 Moreover, the request seeks documents in violation of the right of
19 CSI and its parishioners to freely practice their religion pursuant
20 to the First Amendment to the United States Constitution and the
21 California Constitution.

22 **REQUEST NO. 95:**

23 All declarations or affidavits filed by you in any lawsuit,
24 administrative proceeding, arbitration, mediation, criminal
25 proceeding, in any court of jurisdiction anywhere, which mention,
26 concern or relate in any way to Gerald Armstrong.

27 **RESPONSE TO REQUEST NO. 95:**

28 See response to Request No. 84.

1 **REQUEST NO. 96:**

2 Any documents of any kind whatsoever which support, evidence or
3 reflect any and all damages, whether real or imagined, suffered by
4 you, as a result of each and every act by Gerald Armstrong which
5 you allege is a breach of the 1986 "settle agreement."

6 **RESPONSE TO REQUEST NO. 96:**

7 Objection. The requested documents exceed the scope of
8 permissible discovery because they are not relevant to any issue in
9 this case, and because their production will not lead to the
10 discovery of admissible evidence. CSI's damages in relation to
11 Armstrong's breaches are in the process of being determined by the
12 Marin County Superior Court in the State Action. All evidence
13 relevant and necessary to this issue has or will be produced in
14 that action as deemed appropriate by the Honorable Gary W. Thomas.
15 The Agreement includes a liquidated damages clause, which Judge
16 Thomas has upheld twice, despite Armstrong's vigorous opposition.
17 This request is interposed herein in bad faith and to harass,
18 rather than to obtain relevant discovery.

19 **REQUEST NO. 97:**

20 Any and all judicial judgments, rulings, decisions or opinions
21 in any court or jurisdiction anywhere which mention, concern or
22 relate in any way to "fair Game" or "fair game policy" or "fair
23 game doctrine."

24 **RESPONSE TO REQUEST NO. 97:**

25 See response to Request No. 63.

26 **REQUEST NO. 98:**

27 Any and all documents which support your contention that you
28 are permitted by the 1986 "settlement agreement" with Armstrong to

1 say or publish whatever you want concerning his experiences in
2 relation to you and/or L. Ron Hubbard, and that any response by
3 Armstrong to such statements or publications concerning his
4 experiences constitutes a violation of the 1986 "settlement
5 agreement."

6 **RESPONSE TO REQUEST NO. 98:**

7 Objection. The requested documents exceed the scope of
8 permissible discovery because they are not relevant to any issue in
9 this case, and because their production will not lead to the
10 discovery of admissible evidence. This issue has been fully
11 litigated in the State Action, and decided against Armstrong in not
12 one, but two summary adjudication motions. This request is
13 interposed herein solely to harass and annoy CSI.

14 **REQUEST NO. 99:**

15 All documents which support your assertions that the GO was
16 "criminal," "went criminal" or "were a bunch of criminals."

17 **RESPONSE TO REQUEST NO. 99:**

18 See response to Request No. 63.

19 **REQUEST NO. 100:**

20 All documents comprising, evidencing or reflecting each and
21 every communication from L. Ron Hubbard to anyone in the GO at any
22 time.

23 **RESPONSE TO REQUEST NO. 100:**

24 See response to Request No. 65.

25 **REQUEST NO. 101:**

26 All documents comprising, evidencing or reflecting each and
27 every communication from anyone in the GO, including Guardian and
28 Controller Mary Sue Hubbard, to L. Ron Hubbard at any time.

1 **RESPONSE TO REQUEST NO. 101:**

2 See response to Request No. 65.

3 **REQUEST NO. 102:**

4 Any and all documents of any kind whatsoever which order,
5 suggest, describe, refer to, or relate in any way to illegal or
6 criminal acts by agents, staff or members of the GO, or of any
7 other of your branches, offices or units past or present.

8 **RESPONSE TO REQUEST NO. 102:**

9 See response to Request No. 63.

10 **REQUEST NO. 103:**

11 Any and all documents of any kind whatsoever which concern,
12 show or relate in any way to David Miscavige's and/or your takeover
13 of the GO, and/or removal of Mary Sue Hubbard from her post of
14 Controller.

15 **RESPONSE TO REQUEST NO. 103:**

16 See response to Request No. 63.

17 **REQUEST NO. 104:**

18 Any and all documents upon which you base your pronouncement
19 that Armstrong posed nude in a newspaper.

20 **RESPONSE TO REQUEST NO. 104:**

21 Objection. The request is compound, vague, ambiguous and
22 unintelligible as phrased. Armstrong has not identified the
23 "pronouncement" he claims was made by CSI sufficiently for CSI to
24 determine whether or not it was actually made. However, the
25 requested documents exceed the scope of permissible discovery in
26 any event because they are not relevant to any issue in this case,
27 and because their production will not lead to the discovery of
28 admissible evidence. Further, the request is duplicative, and

1 interposed in bad faith, solely to harass CSI. CSI has already
2 produced documents responsive to this request to Armstrong in the
3 State Action.

4 **REQUEST NO. 105:**

5 Any and all documents upon which you base your pronouncement
6 that Armstrong has adopted a degraded lifestyle.

7 **RESPONSE TO REQUEST NO. 105:**

8 Objection. The request is compound, vague, ambiguous and
9 unintelligible as phrased. Armstrong has not identified the
10 "pronouncement" he claims was made by CSI sufficiently for CSI to
11 determine whether or not it was actually made. However, the
12 requested documents exceed the scope of permissible discovery in
13 any event because they are not relevant to any issue in this case,
14 and because their production will not lead to the discovery of
15 admissible evidence. Further, the request is not interposed for any
16 legitimate purpose, but solely to harass CSI.

17 Notwithstanding these objections, CSI responds that Armstrong
18 already has copies of any documents which are in its possession,
19 custody or control and are responsive to this request.

20 **REQUEST NO. 106:**

21 Any and all documents upon which you base your pronouncement
22 that Armstrong's defense at his trial in 1984 in Armstrong I was a
23 sham and a fraud.

24 **RESPONSE TO REQUEST NO. 106:**

25 See response to Request No. 104.

26 **REQUEST NO. 107:**

27 Any and all documents upon which you base your pronouncement
28 that the Los Angeles Police Department authorized you covert

1 videotaping of Armstrong.

2 **RESPONSE TO REQUEST NO. 107:**

3 See response to Request No. 104.

4 **REQUEST NO. 108:**

5 Any and all documents upon which you base your pronouncement
6 that Armstrong never intended to stick to the terms of the
7 settlement agreement.

8 **RESPONSE TO REQUEST NO. 108:**

9 Objection. The request is compound, vague, ambiguous and
10 unintelligible as phrased. Armstrong has not identified the
11 "pronouncement" he claims was made by CSI sufficiently for CSI to
12 determine whether or not it was actually made.

13 Notwithstanding this objection, CSI has already produced to
14 Armstrong or identified to him in this action all documents in its
15 possession, custody or control that are responsive to this request.

16 **REQUEST NO. 109:**

17 Any and all documents upon which you base your pronouncement
18 that Armstrong was incompetent as a researcher.

19 **RESPONSE TO REQUEST NO. 109:**

20 See response to Request No. 105.

21 **REQUEST NO. 110:**

22 Any and all documents upon which you base your pronouncement
23 that Armstrong perjured himself about surrendering documents to the
24 court.

25 **RESPONSE TO REQUEST NO. 110:**

26 See response to Request No. 105.

27 **REQUEST NO. 111:**

28 Any and all documents upon which you base your pronouncement

1 that Armstrong was ever a heavy drug pusher.

2 RESPONSE TO REQUEST NO. 111:

3 See response to Request No. 105.

4 REQUEST NO. 112:

5 Any and all documents upon which you base your pronouncement
6 that Armstrong is psychotic and lives in a delusory world.

7 RESPONSE TO REQUEST NO. 112:

8 See response to Request No. 105.

9 REQUEST NO. 113:

10 Any and all documents upon which you base our pronouncement
11 that incarceration is an unusually viable vehicle for impressing
12 Armstrong.

13 RESPONSE TO REQUEST NO. 113:

14 See response to Request No. 105.

15 REQUEST NO. 114:

16 Any and all documents upon which you base your pronouncement
17 that Armstrong wanted to plunder you for his own financial gain.

18 RESPONSE TO REQUEST NO. 114:

19 See response to Request No. 105.

20 REQUEST NO. 115:

21 Any and all documents upon which you base your pronouncement
22 that Armstrong's motives are money and power.

23 RESPONSE TO REQUEST NO. 115:

24 See response to Request No. 105.

25 REQUEST NO. 116:

26 Any and all documents upon which you base your pronouncement
27 that Armstrong has no relation to art or artists...except of
28 course, for the photo of himself nude, hugging the globe.

1 **RESPONSE TO REQUEST NO. 116:**

2 See response to Request No. 105.

3 **REQUEST NO. 117:**

4 Any and all documents upon which you base your pronouncement
5 that Armstrong promised to refrain from spreading falsehoods about
6 you.

7 **RESPONSE TO REQUEST NO. 117:**

8 See response to Request No. 105.

9 **REQUEST NO. 118:**

10 Any and all documents upon which you base your pronouncement
11 that Armstrong's motives in writing your attorney Eric Lieberman
12 regarding the case of Malcolm Nothing v. Scientology were money and
13 power.

14 **RESPONSE TO REQUEST NO. 118:**

15 See response to Request No. 105.

16 **REQUEST NO. 119:**

17 Any and all documents upon which you base your pronouncement
18 that Armstrong wanted to plant fabricated documents in Scientology
19 files and tell the IRS to conduct a raid.

20 **RESPONSE TO REQUEST NO. 119:**

21 See response to Request No. 105.

22 **REQUEST NO. 120:**

23 Any and all documents upon which you base your pronouncement
24 that Armstrong is connected to a referral agency for kidnapping.

25 **RESPONSE TO REQUEST NO. 120:**

26 Objection. The request is compound, vague, ambiguous and
27 unintelligible as phrased. Armstrong has not identified the
28 "pronouncement" he claims was made by CSI sufficiently for CSI to

1 determine whether or not it was actually made. However, the
2 requested documents exceed the scope of permissible discovery in
3 any event because they are not relevant to any issue in this case,
4 and because their production will not lead to the discovery of
5 admissible evidence. Further, the request is not interposed for any
6 legitimate purpose, but solely to harass CSI.

7 **REQUEST NO. 121:**

8 Any and all documents up which you base your contention that
9 God does not exist, is not real, and/or that He is an implant, as
10 the term "implant" is used and understood in your writings and
11 jargon.

12 **RESPONSE TO REQUEST NO. 121:**

13 Objection. The request is compound, vague, ambiguous and
14 unintelligible as phrased. Moreover, the requested documents
15 exceed the scope of permissible discovery because they are not
16 relevant to any issue in this case, and because their production
17 will not lead to the discovery of admissible evidence. This
18 request is deliberately argumentative and prejudicial, based on
19 Armstrong's imagination and intended to accuse plaintiff by
20 creating a false "assertion" rather than seek discovery. The
21 request is frivolous and imposed by defendant Armstrong not for any
22 legitimate discovery purpose but solely to harass plaintiff and is
23 an abuse of the discovery process. Further, the request seeks
24 documents in violation of the right of plaintiff and its
25 parishioners to freely practice their religion pursuant to the
26 First Amendment to the United States Constitution. The religious
27 tenets, doctrines or beliefs of the Scientology faith are
28 irrelevant to this action, and may not constitutionally be made the

1 subject of this litigation.

2 Notwithstanding these objections, CSI does not have
3 possession, custody or control of any documents responsive to this
4 request.

5 **REQUEST NO. 122:**

6 Any and all documents upon which you base your contention that
7 Jesus Christ does not exist, is not real, and/or that He is an
8 implant, as implant is used and understood in your writings and
9 jargon.

10 **RESPONSE TO REQUEST NO. 122:**

11 See response to Request No. 121.

12 **REQUEST NO. 123:**

13 Any and all documents upon which you base your contention that
14 the Holy Spirit does not exist, is not real, and/or that He is an
15 implant, as implant is used and understood in your writings and
16 jargon.

17 **RESPONSE TO REQUEST NO. 123:**

18 See response to Request No. 121.

19 **REQUEST NO. 124:**

20 Any and all documents upon which you base your contention that
21 Heaven does not exist, is not real, and/or that it is an implant,
22 as implant is used and understood in your writings and jargon.

23 **RESPONSE TO REQUEST NO. 124:**

24 See response to Request No. 121.

25 **REQUEST NO. 125:**

26 Any and all documents comprising, evidencing, concerning or
27 relating in any way to your ordering, briefing, advising or in any
28 way communicating to any "celebrities," including, but not limited

1 to John Travolta, Kirstie Alley, Ann Archer and Tom Cruise, what or
2 concerning what statements, in public or private, any or all of
3 them should, are or ever were to make concerning you, and/or Gerald
4 Armstrong, and/or L. Ron Hubbard, and/or auditing or any other
5 matter relating to you or Gerald Armstrong.

6 **RESPONSE TO REQUEST NO. 125:**

7 Objection. The request is compound, vague, ambiguous and
8 unintelligible as phrased. Moreover, the requested documents
9 exceed the scope of permissible discovery because they are not
10 relevant to any issue in this case, and because their production
11 will not lead to the discovery of admissible evidence. Further, the
12 request is overbroad, burdensome and oppressive, in that it covers
13 a time period far exceeding the relevant scope of this action, and
14 requests information concerning persons not parties to this action.
15 Further, the request is not interposed for any legitimate purpose,
16 but solely to harass CSI.

17 Notwithstanding these objections, CSI does not have
18 possession, custody or control of any documents responsive to this
19 request.

20 **REQUEST NO. 126:**

21 Any and all biographies of L. Ron Hubbard, including but not
22 limited to "about the author" sections and/or biographical sketches
23 or any other writing published, written and/or disseminated in any
24 form at any time by you from 1950 to the present.

25 **RESPONSE TO REQUEST NO. 126:**

26 Objection. The request is compound, vague, ambiguous and
27 unintelligible as phrased. Moreover, the requested documents exceed
28 the scope of permissible discovery because they are not relevant to

1 any issue in this case, and because their production will not lead
2 to the discovery of admissible evidence. Further, the request is
3 overbroad, burdensome and oppressive, in that it covers a time
4 period far exceeding the relevant scope of this action, and
5 requests information concerning persons not parties to this action.
6 Further, the request is not interposed for any legitimate purpose,
7 but solely to harass CSI. Moreover, this request concerns issues
8 which Armstrong raised in a cross-complaint in the State Action as
9 to which demurrer was sustained, and Armstrong should not be
10 permitted to re-litigate them here.

11 **REQUEST NO. 127:**

12 Each and every document on which you base each and every
13 assertion about L. Ron Hubbard made in each of the biographies of
14 L. Ron Hubbard, including but not limited to "about the author"
15 sections and/or biographical sketches or any other writing
16 published, written and/or disseminated in any form at any time by
17 you from 1950 to present.

18 **RESPONSE TO REQUEST NO. 127:**

19 See response to Request No. 126.

20 **REQUEST NO. 128:**

21 Each and every document which mentions, concerns or related in
22 any way to John W. Parsons, Flavia Julia, the "Empress," Margery
23 Cameron and/or Aleister Crowley.

24 **RESPONSE TO REQUEST NO. 128:**

25 See response to Request No. 121.

26 **REQUEST NO. 129:**

27 Each and every document which supports your asserting that L.
28 Ron Hubbard was sent by the United States Navy into a black magic

1 ring to break it up.

2 **RESPONSE TO REQUEST NO. 129:**

3 Objection. The request is compound, vague, ambiguous and
4 unintelligible as phrased. Armstrong has not identified the
5 "assertion" he claims was made by CSI sufficiently for CSI to
6 determine whether or not it was actually made. However, the
7 requested documents exceed the scope of permissible discovery in
8 any event because they are not relevant to any issue in this case,
9 and because their production will not lead to the discovery of
10 admissible evidence. Further, the request is overbroad, burdensome
11 and oppressive, in that it covers a time period far exceeding the
12 relevant scope of this action, and requests information concerning
13 persons not parties to this action. Moreover, this request concerns
14 issues which Armstrong raised in a cross-complaint in the State
15 Action as to which demurrer was sustained, and Armstrong should not
16 be permitted to re-litigate them here.

17 **REQUEST NO. 130:**

18 Each and every document on which you base each and every
19 allegation concerning Gerald Armstrong in this case, Scientology v.
20 Armstrong, US Bankruptcy Court for the Northern District of
21 California, Case no. 95-1164, hereinafter "Armstrong V."

22 **RESPONSE TO REQUEST NO. 130:**

23 See CSI's Rule 26 disclosure statement.

24 **REQUEST NO. 131:**

25 Each and every document identifying, listing, showing,
26 evidencing, reflecting, concerning or relating in any way to each
27 and every organization aligned against you, as referred to in
28 Exhibit A, to the complaint in Armstrong V., at para. 7G.

1 **RESPONSE TO REQUEST NO. 131:**

2 Objection. The request is compound, vague, ambiguous and
3 unintelligible as phrased. Moreover, the requested documents
4 exceed the scope of permissible discovery because they are not
5 relevant to any issue in this case, and because their production
6 will not lead to the discovery of admissible evidence. If Armstrong
7 is referring to the Settlement Agreement, issues concerning its
8 validity, interpretation and meaning are not at issue in this
9 litigation. They have already been decided in the State Action.

10 **REQUEST NO. 132:**

11 Each and every document recording, evidencing, reflecting,
12 concerning or relating in any way to any discussions,
13 communications or negotiations of any kinds, form or nature between
14 you and/or Michael Flynn and/or Gerald Armstrong concerning
15 liquidated damages as a condition of settlement, the amount of such
16 liquidated damages condition, the reasonable of such liquidated
17 damages condition, and any relationship of any kind between such
18 liquidated damages and any actual or actually foreseeable damages.

19 **RESPONSE TO REQUEST NO. 132:**

20 See response to Request No. 131.

21 **REQUEST NO. 133:**

22 Each and every document showing, evidencing, reflecting,
23 concerning or relating in any way to your assets in December, 1986,
24 including, but not limited to, cash, income, bank accounts,
25 holdings, real property, intellectual property, personnel, rights,
26 patents, stocks, commodities, and contracts, located anywhere in
27 the world.

28 ///

1 **RESPONSE TO REQUEST NO. 133:**

2 Objection. The requested documents exceed the scope of
3 permissible discovery because they are not relevant to any issue in
4 this case, and because their production will not lead to the
5 discovery of admissible evidence. Further, this request violates
6 the constitutional associational and privacy rights of CSI and
7 others pursuant to the California and United States constitutions,
8 and CSI's statutory rights to the privacy of financial information.
9 Further, the request is overbroad, burdensome and oppressive, in
10 that it covers a time period far exceeding the relevant scope of
11 this action. Further, the request is not interposed for any
12 legitimate purpose, but solely to harass CSI.

13 **REQUEST NO. 134:**

14 Each and every "confidentiality agreement," "non-disclosure
15 agreement," "confidentiality bond," or "non-disclosure bond," to
16 which you are or have ever been a party or beneficiary from 1950 to
17 the present.

18 **RESPONSE TO REQUEST NO. 134:**

19 See response to Request No. 10.

20 **REQUEST NO. 135:**

21 Any and all documents identifying, listing, naming, showing or
22 indicating each and every individual who executed each and every
23 "confidentiality agreement," "non-disclosure agreement,"
24 "confidentiality bond," or "non-disclosure bond," to which you are
25 or have ever been a party or beneficiary from 1950 to the present.

26 **RESPONSE TO REQUEST NO. 135:**

27 See response to Request No. 10.

28 **REQUEST NO. 136:**

1 Any and all documents comprising, evidencing or reflecting,
2 concerning or relating in any way to any attempt or effort by you
3 to enforce by any means or manner whatsoever any or every
4 "confidentiality agreement," "non-disclosure agreement,"
5 "confidentiality bond," or "non-disclosure bond," to which you are
6 or have ever been a party or beneficiary from 1950 to the present.

7 RESPONSE TO REQUEST NO. 136:

8 See response to Request No. 10.

9 REQUEST NO. 137:

10 Each and every lawsuit, complaint, prosecution or
11 administrative proceeding from 1950 to the present in which you are
12 or have been named a party.

13 RESPONSE TO REQUEST NO. 137:

14 Objection. The request is compound, vague, ambiguous and
15 unintelligible as phrased. By defining "you" to include not merely
16 the Creditor, but at least 16 other named entities, including other
17 churches and religious corporations, divisions of corporations,
18 unincorporated associations, and numerous unnamed and unspecified
19 groups, Armstrong is attempting to use this discovery request to
20 compel discovery from non-parties. Moreover, the requested
21 documents exceed the scope of permissible discovery because they
22 are not relevant to any issue in this case, and because their
23 production will not lead to the discovery of admissible evidence.
24 Further, the request is overbroad, burdensome and oppressive, in
25 that it covers a time period far exceeding the relevant scope of
26 this action, and requests information concerning persons not
27 parties to this action. Moreover, many of the documents requested
28 are equally available to Armstrong as part of the public record.

1 Further, the request seeks to obtain the records of cases which
2 have been ordered sealed by the courts having jurisdiction over the
3 actions. Moreover, the request is cumulative, duplicative.
4 Further, the request is not interposed for any legitimate purpose,
5 but solely to harass CSI.

6 **REQUEST NO. 138:**

7 Each and every lawsuit, complaint, prosecution or
8 administrative proceeding from 1950 to the present participated in,
9 or funded or supported in any way or manner whatsoever in which you
10 were not a named party.

11 **RESPONSE TO REQUEST NO. 138:**

12 See response to Request No. 137.

13 **REQUEST NO. 139:**

14 Each and every appellate opinion or decision published or
15 unpublished in any appeal of any judgment decision or ruling in any
16 case in which you are or were a party at any time anywhere in the
17 world.

18 **RESPONSE TO REQUEST NO. 139:**

19 See response to Request No. 137.

20 **REQUEST NO. 140:**

21 Each and every request or demand for refund or repayment of
22 money paid to you by any and all persons at any time from 1950 to
23 the present.

24 **RESPONSE TO REQUEST NO. 140:**

25 See response to Request No. 137.

26 **REQUEST NO. 141:**

27 Each and every document produced by Gerald Armstrong to you in
28 the case of Scientology v. Armstrong, Marin County Superior Court

1 No. 157680 ("Armstrong IV").

2 RESPONSE TO REQUEST NO. 141:

3 Objection. Armstrong obviously has possession of these
4 documents. This request is interposed in bad faith, and solely to
5 harass CSI.

6 REQUEST NO. 142:

7 Each and every document on which you base your assertion that
8 Gerald Armstrong's experiences as a Scientologist were not
9 religious experiences.

10 RESPONSE TO REQUEST NO. 142:

11 See response to Request No. 104.

12 REQUEST NO. 143:

13 Each and every document which show or evidence that your
14 actions of any kind in using the secular courts or any extra-legal
15 means to silence Armstrong or prevent him from expressing his
16 opinions about you, L. Ron Hubbard or any other subject, or prevent
17 him from responding to anything stated by you about him, or any
18 attach on him, are not violations of your "creed;" specifically
19 that all men have inalienable rights to talk freely, to write
20 freely their own opinions and to counter or utter or write upon the
21 opinions of other; that all men have inalienable rights to their
22 own religious practices and their performance; that all men have
23 inalienable rights to their own defense; and that no agency less
24 than God has the power to suspend or set aside these rights,
25 overtly or covertly.

26 RESPONSE TO REQUEST NO. 143:

27 See response to Request No. 121.

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1 **REQUEST NO. 144:**

2 Each and every document on which you base your assertion that
3 in any or every action taken by Gerald Armstrong which relate in
4 any way to you he was not guided by God.

5 **RESPONSE TO REQUEST NO. 144:**

6 Objection. The request is compound, vague, ambiguous and
7 unintelligible as phrased. The religious beliefs of the parties
8 are not relevant to any matter at issue in this litigation. The
9 requested documents exceed the scope of permissible discovery
10 because they are not relevant to any issue in this case, and
11 because their production will not lead to the discovery of
12 admissible evidence. Further, the request is overbroad, burdensome
13 and oppressive, in that it covers a time period far exceeding the
14 relevant scope of this action, and requests information concerning
15 persons not parties to this action.

16 Dated: September 22, 1995 Respectfully submitted,

17 MOXON & BARTILSON

18
19 By: Laurie J. Bartilson
20 Laurie J. Bartilson *all*

21 Andrew H. Wilson
22 WILSON, RYAN & CAMPILONGO

23 Attorneys for Creditor
24 CHURCH OF SCIENTOLOGY INTERNATIONAL
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STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I am employed in the County of California, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Hollywood, CA 90028.

On November 27, 1995, I served the foregoing document described as CREDITOR CHURCH OF SCIENTOLOGY INTERNATIONAL'S RESPONSE TO DEBTOR GERALD ARMSTRONG'S FIRST INSPECTION DEMAND TO PLAINTIFF on interested parties in this action,

[] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [] the original [X] true copies thereof in sealed envelopes addressed as follows:

Gerald Armstrong
715 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

[X] BY MAIL

[] *I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[X] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on November 27, 1995, at Los Angeles,
California.

1 [] **(BY PERSONAL SERVICE) I delivered such
2 envelopes by hand to the offices of the
addressees.

3 Executed on _____, at Los Angeles, California.

4 [X] (State) I declare under penalty of the laws
5 of the State of California that the above is true
and correct.

6 [] (Federal) I declare that I am employed in the
7 office of a member of the bar of this court at
whose direction the service was made.

8 Abe E. Remuro

9 Print or Type Name

Mr. J. E. Remuro
Signature

10 * (By Mail, signature must be of person depositing
11 envelope in mail slot, box or bag)

12 ** (For personal service signature must be that of
13 messenger)

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